

Okanogan Valley Bass Club Comment after FEIS Addendum Finalized

From: Terry Llewellyn <Terry.Llewellyn@sunopta.com>
Sent: Saturday, August 17, 2013 10:01 AM
To: Bolding, Bruce D (DFW)
Cc: SEPADesk2 (DFW)
Subject: RE: Comment on SEPA No. 13055

Bruce,

Thanks for your response to my comments. I would also like to submit comments recently composed by the Okanogan Valley Bass Club expressing our concerns regarding the proposed Spectacle Lake Rehab; please see below:

Re: written comments on the [Lake and Stream Rehabilitation 2013](#)

Since 1951 WDFW has attempted to convert Spectacle Reservoir to a trout only body of water. So far you have had success in removing the carp however little if any success in removing warm-water fish for any length of time. Spectacle Reservoir may well be the most poisoned body of water in the state. Since 1951 there has been disagreement on if warm-water fish should be allowed in this Reservoir. With this Reservoir being below 2500 feet in elevation and water temperature running in the low 80s, 1 to 2 feet under the surface, last week it is hard for OVBC members to believe this is a great trout lake that the WDFW has been trying for the past 60 years to make it.

OVBC disputes the statement in the PRE-REHABILITATION-PLAN *"It is a lake of statewide significance, with potential maximum opening day crowds approaching 500 anglers."* Spectacle Reservoir opens April 1st and at time in the past has still had ice on it opening day. This may have been true in the 60s or 70s but is a complete exaggeration in the last decade. Simple math with 4 persons to a car would put 125 vehicles at resorts and around the lake. Look at a map of the lake there is not that much space for them to park. Please provide any data that you have to back this statement up.

OVBC disputes the math in the PRE-REHABILITATION-PLAN *"Recreational angling opportunity will be increased if the undesirable species are removed from Spectacle Lake. The level of participation will dwindle to almost nothing if no action is taken immediately."* We have witnessed the shift from trout to spiny-ray and cannot believe that participation will dwindle to almost nothing if no action is taken immediately. Trout fishing has been good this season and we have observed many spiny-ray fishermen releasing trout this summer. We dispute that actions is an immediate need.

"Given the success of the planned management action, as many as 10,000 fishing days are estimated for the season. Anglers should average about four-five fish per trip if the treatment is successful. Yearling trout should average about 11 inches. Carryovers should be expected to be about 20 percent of the catch, and average 15 inches for 2-year-old fish."

We cannot believe that Spectacle Reservoir will support an average of 54 fishermen per day or 1 fisherman for every 5 1/2 acres per day. How did you come up with this number?

If we accept your numbers we believe that you are not stocking the needed numbers of trout nor can the lake support that level of use. 10,000 fishing days with 4 or 5 fish per day is 40,000 or 50,000 fish not the 30,000 catchable in the plan for the first year. We do not believe that even the 100,000 fingerlings would be meet the stated 40,000 to 50,000 needed let alone the 8,000 to 10,000 carry over in the management plan. Predation from Osprey, Eagles, Migrating waterfowl, gulls, turtles and catchable trout planted will remove a percentage. We have witnessed dead loss from transportation along with die off because of the weeds when the lake turns over. We find it hard to believe that you have better than a 50% survival. It appears that your PRE-REHABILITATION-PLAN and FISH MANAGEMENT PLAN are in conflict and do not agree on the fish needed. Please advise use which is correct and how you plan to meet that need.

Please help us understand you're stocking rates in the Lake Management plan. It appears that you consider the entire reservoir suitable habitat and plan to stock 163- 244 fish per ac. Which from our research is on the high end of the recommended scale? However after a survey of the lake with Okanogan County Weed manager and USBR representative the usable water is closer to 200 ac. This would put the stocking rate at 250 – 375 fish per ac. Can this lake truly sustain this stocking level with an additional 50,000 Kokanee?

OVBC disputes the ECONOMIC IMPACTS in the PRE-REHABILITATION-PLAN “*Rehabilitation would restore the fishery and associated economic activity. An estimated 5,000 or more trips will be made to Spectacle Lake as a result of the proposed management action, with an economic impact totaling \$660,000 per year (WDW estimate of \$132 per trip)*”. Since 2005 there have been two businesses in Tonasket that have added bass and perch fishing supplies (Midway building supply last year, Scholz's Sporting goods increased inventory 4 years ago). We believe that after July 1st that participation will actually decrease after treatment on Spectacle because of the weeds and warm water. Because of the weeds people can no longer fish from shore for trout. OVBC estimates that the net participation will be the same and not 5,000 more trips. Participation may increase for trout in spring after news releases from WFDF, however after June or July weed growth and lack of spiny-ray participation will be far less than current. Members have been watching during the month of July and would estimate 50-60% use water skiing and swimming, 30-40% spiny-ray fishing and 10-20% trout. Economic Impacts are flawed in the fact that they do not take into account the loss of spiny-ray opportunity and the effect on Tonasket businesses. Please provide any data that would substantiate your claims.

Your statement that this treatment will increase license sales is unbelievable. License sale have been on the decline and it is hard to believe that treatment of a 307 acre reservoir will increase license sales. We can make the opposite statement that with the warm summer water, weed problem, and lack of spiny-ray opportunity license sales will decrease.

We believe that Spectacle Reservoir is filling a niche for small boaters that want to harvest spiny-ray for food. Whitestone is too small and cannot keep up with the demand, because of health reasons the river is not an option for many, and Palmar is too big for some. Times are changing and we do not believe that the WDFW is keeping up with the demands of the consumer as shown by the declining license sales.

The PRE-REHABILITATION-PLAN states that this action was prompted by public concern over the increasing numbers of lakes in Okanogan County with undesirable species infestations. How many of those concerns were about Spectacle Reservoir? How many of those concerns have your received from the public in the last 3 years and on what bodies of water?

FSEIS 2002 page 14 *“The biologist submits a Post-Rehabilitation Report (see Appendix B) for each water treated; it describes, among other things, the probability of a complete kill, water conditions at the time of treatment, and detoxification measures if any.”* We have had many discussions with the local Biologist about the success of Rotenone treatments on Spectacle Reservoir. At the Tonasket Public meeting we were told that nothing is 100% yet the PRE-REHABILITATION-PLAN *“Given a reasonable chance of eliminating the populations of undesirable species, the beneficial effects should be noticeable one-two years post treatment.”* From this we cannot find the probability of a complete kill. Is 51% a reasonable chance? Please furnish the required information.

The PRE-REHABILITATION-PLAN States that *“Lake rehabilitation with rotenone was a successful management tool for Spectacle Lake in 2005, which was the last time the lake was treated. A concentration of 3ppm was necessary to remove brown bullheads, pumpkinseed sunfish, bluegills, largemouth and smallmouth bass.”* The 2013 PRE-REHABILITATION-PLAN states a concentration of 2ppm will be used. Please inform us on what changed to reduce the amount of Rotenone.

FINAL PROGRAMMATIC ENVIRONMENTAL ASSESSMENT, WDFW Statewide Lake and Stream Rehabilitation Program, As funded by the USFWS Wildlife and Sportfish Restoration Program September 30, 2008 *“2.1.3. Public Outreach and SEPA WDFW’s routine public outreach on proposed projects includes public meetings near the waters being considered for treatment and a public meeting in western Washington, all announced through local and other news releases; individual contacts with all landowners and water right holders on waters selected for treatment; extensive public disclosure and solicitation of comments through the SEPA review process; notification of anglers using waters being considered for treatment; postings on the agency web site; postings at the selected treatment site; and other venues and processes. This level of public engagement and response will continue regardless of the alternative chosen as a result of this assessment.”* At the Tonasket Public meeting there were two landowners present that had not received contact on the proposed treatment of the Reservoir. How many others were missed?

The weeds are a significant problem for the fish as well as a public safety concern. At the Tonasket Public meeting we heard that weeds were not the WDFW’s problem. The weeds decrease Rotenone effectiveness; reduce the carrying capacity of the Reservoir, are a barrier to bank fishermen, and are a danger to recreational users. Please explain how they are not your problem?

From the public meeting we heard that if the reservoir was treated with Rotenone, the weed treatment would have to be postponed. From this we gather that the WDFW puts trout ahead of public safety and habitat improvement. Is this true?

FINAL PROGRAMMATIC ENVIRONMENTAL ASSESSMENT, WDFW Statewide Lake and Stream Rehabilitation Program, As funded by the USFWS Wildlife and Sportfish Restoration Program September 30, 2008, *“2.1.5. Treatment and monitoring of approved projects Treatment is conducted according to EPA label restrictions, Washington pesticide use rules, Washington Fish and Wildlife Commission policy, conditions of the NPDES permit, and any provisions mandated by the funding source. Monitoring of*

*water quality parameters, such as pH, temperature, alkalinity, and organic demand is conducted immediately pretreatment, as required by the NPDES permit. Monitoring for rotenone toxicity, residual inert ingredients from liquid rotenone products, and changes in zooplankton and aquatic macroinvertebrate populations is likewise conducted pre- and post-treatment as required by the permit.*for water quality and pre and post conditions.” The Spectacle Lake management plan only talks about monitoring fish growth, angler participation and species composition. Water quality is a huge concern to the local growers that depend on the water from the reservoir for their crops.

At the public meeting we heard when asked about macroinvertebrate that if they were present before the treatment they would be there after the treatment. Was all the required pre and post monitoring done for the 2005 treatment? Has any pre-treatment monitoring been done for the 2013 proposed treatment? Is it possible for us to receive all the pre- and post-treatment monitoring reports?

This project should not go forward if all the required monitoring is not funded and going to be collected.

We have lost all faith in the Local Biologist from past actions. We grew tired of hearing “we could try that” when asked how we lengthen out the time between Rotenone treatments. After the 2005 treatment we proposed net pens. We were told that the WDFW would not fund a project like that but if we wanted to fund the nets “*we could try that*”. We secured donors along with OVBC willing to fund the nets and volunteers to feed the fish. We were then told that it would not work on Spectacle and did not have his support. It was not until the Tonasket Public meeting that we heard the reasons why not. We did not bring this up at the public meeting because we still want to try and work with the WDFW just not the current Biologist.

In conclusion OVBC cannot support the 60 year old war on bass in Spectacle Reservoir with yet another Rotenone treatment.

Thank you for your time and consideration,

Terry Llewellyn, Secretary – Okanogan Valley Bass Club